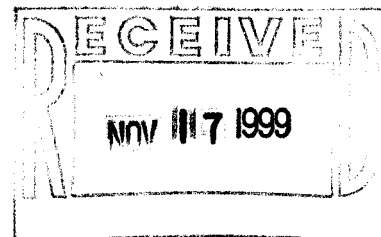




KAISER • HILL  
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## INTEROFFICE MEMORANDUM

DATE: November 16, 1999

TO: C. E. Kennedy, K-H, Bldg 130, X7543

FROM: S. M. Nesta, K-H/ESS, T130C, X6386 *SM Nesta*

SUBJECT: NEPA DETERMINATION FOR THE TENT 10 LL/LLM WASTE  
REPACKAGING PROJECT - SMN-154-99



I have reviewed the project to modify and operate Tent 10 for repackaging and temporary storage of waste chemicals, low level (LL) waste, and low level mixed (LLM) waste. My understanding of the project is as follows: The proposed repack operations will occur at a Permacon located within Tent 10, with two shifts initially operating per day. Non-compliant containers will be taken into the Tent 10 Permacon, and examined prior to sending the waste through the repackaging process. If wastes are identified that cannot be handled by the Tent 10 process, they will be removed and taken to an appropriate location for management. For example, liquid LL/LLM wastes and waste chemicals will be taken to Tent 11 for repackaging. While current plans call for LL/LLM waste (solids) to be repackaged in Tent 10 and directly shipped to off-Site disposal locations, waste containers may also be temporarily stored at Tent 10 in accordance with the modified RCRA storage permit. RCRA Unit 35, a cementation treatment unit currently located in Tent 10, will be closed. An area on the south side of Tent 10, about 35' x 100', will be paved with asphalt.

As regards environmental compliance, a letter that specifies bounding assumptions used in the air quality analysis is attached. If the bounding assumptions are incorrect, please contact Mike Putney at X2692. The retrofit of Tent 10 should include an inspection of the berm surrounding the 904 Pad to ensure that the berm is in good condition. During construction and once the new operations have begun, stormwater that collects in the bermed area around the tent must be managed in accordance with the Control and Disposition of Incidental Waters procedure (1-C91-EPR-SW.01). The Surface Water contact for this program is Sue Barker (X3114). No other environmental compliance issues are identified.

With regard to the NEPA documentation for the project, I recommend that the project be categorically excluded from further NEPA documentation requirements, pending resolution of the aforementioned issues. Attached is a copy of the draft Categorical Exclusion (CX) Determination for the project. Please review the project description portion of the draft CX Determination for accuracy and completeness. Pending any changes you request, this document should be transmitted to RFFO's NEPA Compliance Officer (John Morris) with a request for a

final NEPA determination on the project. To maintain tracking of NEPA projects, please copy me on your transmittal to RFFO, at which time we will forward an electronic copy of the CX to Mr. Morris for his use.

If changes arise that alter the scope of the project, please contact me so that we can review the changes for NEPA compliance. Please do not hesitate to contact me at X6386 if you have any questions or need additional information.

cc:

Karan North, K-H  
Ted Hopkins, RMRS  
Sue Barker, RMRS  
File

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## INTEROFFICE MEMORANDUM

DATE: November 9, 1999

TO: S. M. Nesta, K-H Environmental Systems and Stewardship, T130C, X6386

FROM: *C. A. Patnoe*  
C. A. Patnoe, K-H Environmental Systems and Stewardship, T130C, X2440

SUBJECT: REVIEW OF LL/LLM WASTE REPACKAGING PROJECT – CAP-164-99

Ref: Letter #SMN-139-99 from S. M. Nesta to distribution entitled "LL/LLM Waste Repackaging Project", attached Environmental Checklist, and information from project personnel

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Per your request, Air Quality Management/Radian International (AQM) has evaluated the project to repackage low-level/low-level mixed (LL/LLM) waste in Tent 10 for air quality regulatory issues. The project has the potential to emit regulated air pollutants and was assessed to determine regulatory reporting, permitting, approval, and air monitoring requirements. Based on information provided in the environmental checklist and by project personnel, there are no air quality regulatory issues associated with this project. This determination is based on the following bounding assumptions:

- The repack facility is designed to conservatively repack approximately 750 cubic meters of LL/LLM waste per year, per shift;
- The repack facility will operate a maximum of 260 days per year, at two shifts per day;
- All LL/LLM waste is worst-case (for volatile organic compounds) IDC 801 (solidified organics);
- All LL/LLM waste is at the maximum contamination level of 100 nanocuries per gram; and
- The repack facility will exhaust to the atmosphere through a two-stage HEPA filtration system.

**Radionuclide Air Quality Assessment**

Radionuclide air effluent emissions from Department of Energy (DOE) facilities are governed by the Colorado Air Quality Control Commission's (CAQCC) Regulation No. 8, Part A, Subpart H (40 CFR 61, Subpart H) *National Emission Standards for Emissions of Radionuclides Other Than Radon from DOE Facilities*. The regulation specifies several requirements that are applicable to the Rocky Flats Environmental Technology Site (Site), including environmental monitoring, reporting, permitting, and quality assurance requirements. Section 61.93 mandates

**-SAFE AND COMPLIANT CLOSURE-**

continuous radionuclide air emission monitoring for all points that have an estimated potential effective dose equivalent (EDE) to the most impacted public receptor of greater than 0.1 millirem per year (mrem/yr), based on uncontrolled emissions. Section 61.96(b) requires that an application for approval (Section 61.07) and notification of start-up (Section 61.09) be filed with the U. S. Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment (CDPHE) for any new or modified source of radionuclide emissions if estimated controlled emissions from the source would cause the most impacted public receptor to receive an EDE of 0.1 mrem/yr or greater.

Based on project information and the above listed assumptions, the estimated EDE to the most impacted public receptor resulting from controlled radionuclide emissions from the Tent 10 repack project is  $6.8\text{E-}05$  mrem/yr, and the estimated EDE resulting from uncontrolled radionuclide emissions is  $6.8\text{E-}03$  mrem/yr. The project will not require EPA/CDPHE approval or continuous radionuclide air monitoring.

### **Non-radionuclide Air Quality Assessment**

CAQCC Regulation No. 3 (Reg. 3) contains Air Pollutant Emissions Notice (APEN), air quality construction permit, and air quality operating permit provisions that are applicable to all sources of air pollutants, except as otherwise exempted in the regulation. Reg. 3 states that except where specifically authorized by the terms of Reg. 3, no person shall commence construction or operation of any stationary air emission source or modification of a stationary source without first obtaining or having a valid APEN and/or an air emissions permit from CDPHE, Air Pollution Control Division.

Based on the above-listed assumptions, the total volatile organic compound emissions and the worst-case hazardous air pollutant emissions resulting from repackaging of 1,500 cubic meters of LL/LLM waste per year are estimated to be 450 pounds and 243 pounds (carbon tetrachloride) respectively, and will not exceed the permitting and reporting thresholds contained in Reg. 3. Thus, the Tent 10 repack project will be exempt from air quality permitting and APEN requirements.

If there are any significant changes to the project parameters that were outlined in the information provided by project personnel, AQM must be notified as soon as possible and a new assessment will be performed. Please contact Mike Putney of AQM/Radian at X2692 for any questions regarding this assessment.

MTP

cc:

M. Hyder (Radian)

M. Putney (Radian)

<DATE>

99-RF-XXXX

J. Morris, NEPA Compliance Officer  
DOE, RFFO

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DOCUMENTATION FOR  
[PROJECT NAME] - YYY-XXX-99

Attached is a draft categorical exclusion for the subject project. Kaiser-Hill NEPA staff recommend that this project be categorically excluded from further NEPA documentation requirements. A draft Categorical Exclusion Determination is included for your review and an electronic copy of the draft Determination has been made available to you.

Please provide a final NEPA determination for this project at your earliest convenience. If you have any questions or need additional information, please contact [PROJECT CONTACT AND EXTENSION].

**SAMPLE**

Name, Director  
Division

XXX:xxx

Orig. and 1 cc - J. Morris

Attachments:  
As Stated (1).

cc:  
S. M. Nesta, K-H

**DOE NEPA REGULATIONS SUBPART D**  
**CATEGORICAL EXCLUSION (CX) DETERMINATION - RFFO/CX00-99**

**Proposed Action:** Tent 10 LL/LLM Waste Repackaging Project

**Location:** Rocky Flats Environmental Technology Site, Golden, CO

**Proposed by:** U.S. Department of Energy Rocky Flats Field Office (DOE, RFFO)

**Description of the Proposed Action:**

The Rocky Flats Field Office (RFFO) proposes to modify and operate Tent 10 for repackaging and temporary storage of low level (LL) waste and low level mixed (LLM) waste. The proposed repack operations will occur at a Permacon located within Tent 10, with two shifts initially operating per day. Non-compliant containers will be taken into the Tent 10 Permacon, and examined prior to sending the waste through the repackaging process. If wastes are identified that cannot be handled by the Tent 10 process, they will be removed and taken to an appropriate location for management. While current plans call for LL/LLM waste (solids) to be repackaged in Tent 10 and directly shipped to off-Site disposal locations, waste containers may also be temporarily stored at Tent 10. RCRA Unit 35, a cementation treatment unit currently located in Tent 10, will be closed. An area on the south side of Tent 10, about 35' x 100', will be paved with asphalt.

**Categorical Exclusion to be Applied:**

B6.6 Modification (excluding increases in capacity) of an existing structure used for storing, packaging, or repacking waste other than high-level radioactive waste or spent nuclear fuel, to handle the same class of waste as currently handled at that structure.

**Justification:**

The proposed action is for the modification of an existing structure (Tent 10) used for storing, packaging, and repacking LL/LLM waste. Modifications will include changes to a Permacon currently located in the tent, removal of a RCRA-permitted treatment unit, paving in the immediate vicinity of the tent, and repairs and other minor changes at Tent 10. The facility will not be expanded. Wastes to be managed at the structure will be the same class of waste as are currently handled at that structure, and will not include high-level radioactive waste or spent nuclear fuel.

In accordance with 10 CFR 1021.410(b), the project (a) fits within the class of actions listed in Subpart D, Appendix B of 10 CFR 1021, (b) exhibits no extraordinary circumstances that may affect the significance of its environmental effects, and (c) is not "connected" (per 40 CFR 1508.25[a][1]) to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts (per 40 CFR 1508.25[a][2]), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

Further, in accordance with 10 CFR 1021, Subpart D, Appendix B, the project would not (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders, (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; or (4) adversely affect environmentally sensitive resources.

**I have determined that the proposed action meets the requirements for a categorical exclusion as defined in Subpart D of 10 CFR 1021. Therefore, I approve the categorical exclusion of the proposed action from further NEPA review and documentation.**

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

RFFO NEPA Compliance Officer